

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, NY 10005-1702

FLOYD ABRAMS
L. HOWARD ADAMS
ROBERT A. ALESSI
HELENE R. BANKS
ANIRUDH BANSAL
LANDIS C. BEST
BRADLEY J. BONDI
SUSAN BUCKLEY
KEVIN J. BURKE
JAMES J. CLARK
BENJAMIN J. COHEN
SEAN M. DAVIS
STUART G. DOWNING
ADAM M. DWORKIN
ANASTASIA EFIMOVA
JENNIFER B. EZRING
JOAN MURTAGH FRANKEL
JONATHAN J. FRANKEL

BART FRIEDMAN
CIRO A. GAMBONI
CHARLES A. GILMAN
JASON M. HALL
WILLIAM M. HARTNETT
CRAIG M. HOROWITZ
DOUGLAS S. HOROWITZ
TIMOTHY B. HOWELL
DAVID G. JANUSZEWSKI
ELAI KATZ
THOMAS J. KAVALER
BRIAN S. KELLEHER
DAVID N. KELLEY
RICHARD KELLY
CHÉRIE R. KISER*
EDWARD P. KRUGMAN
JOEL KURTZBERG
MARC R. LASHBROOK

TELEPHONE: (212) 701-3000
WWW.CAHILL.COM

1990 K STREET, N.W.
WASHINGTON, DC 20006-1181
(202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP
24 MONUMENT STREET
LONDON EC3R 8AJ
+44 (0)20 7920 9800

WRITER'S DIRECT NUMBER

(212) 701-3120

ALIZA R. LEVINE
JOEL H. LEVITIN
GEOFFREY E. LIEBMANN
ANN S. MAKICH
JONATHAN I. MARK
BRIAN T. MARKLEY
WILLIAM J. MILLER
NOAH B. NEWITZ
MICHAEL J. OHLER
ATHY A. O'KEEFFE
DAVID R. OWEN
JOHN PAPACHRISTOS
LUIS R. PENALVER
KIMBERLY PETILLO-DÉCOSSARD
MICHAEL W. REDDY
JAMES ROBINSON
THORN ROSENTHAL
TAMMY L. ROY

JONATHAN A. SCHAFFZIN
JOHN SCHUSTER
MICHAEL A. SHERMAN
DARREN SILVER
HOWARD G. SLOANE
JOSIAH M. SLOTNICK
RICHARD A. STIEGLITZ JR.
SUSANNA M. SUH
ANTHONY K. TAMA
JONATHAN D. THIER
JOHN A. TRIPODORO
GLENN J. WALDRIP, JR.
HERBERT S. WASHER
MICHAEL B. WEISS
S. PENNY WINDLE
DAVID WISHENGRAD
COREY WRIGHT
JOSHUA M. ZELIG
DANIEL J. ZUBKOFF

* ADMITTED IN DC ONLY

September 9, 2015

Re: *In re Libor-Based Financial Instruments Antitrust Litig.*,
No. 11 Civ. 2613 (NRB), Master File No. 1:11-md-2262-NRB

Dear Judge Buchwald:

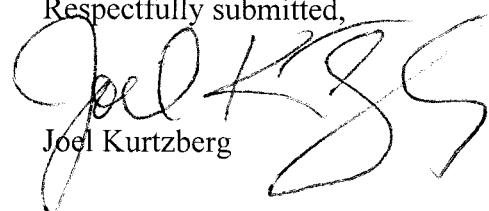
We are counsel for defendant Credit Suisse Group AG (“CSGAG”)¹ and write to request permission to file under seal portions of a letter being submitted in opposition to Exchange-Based Plaintiffs’ letter, dated August 27, 2015. Portions of our letter refer to and describe transcripts from the criminal trial in the United Kingdom, *In the Southwark Crown Court v. Tom Hayes*, Case No. T20137308. Exchange-Based Plaintiffs addressed that testimony in their August 27, 2015 letter and indicated that the transcripts were obtained pursuant to an agreement with the Southwark Crown Court that limits public use of certain portions of the trial testimony. In accord with the restrictions imposed by the Southwark Crown Court, Defendants respectfully request permission to file portions of the letter under seal. To ensure public access to portions of the letter that do not refer to or describe the *Hayes* trial transcripts, we propose filing a redacted version of the letter via ECF, upon court approval, that makes public all parts of the letter that do not pertain to the *Hayes* trial transcripts. Copies of the redacted and unredacted versions of the letter are enclosed for the Court.

¹ Defendants The Bank of Tokyo-Mitsubishi UFJ, Ltd. (“BTMU”), Deutsche Bank AG, HSBC Holdings PLC, HSBC Bank PLC, Lloyds Banking Group plc, Lloyds Bank plc (formerly known as Lloyds TSB Bank plc), HBOS plc, Portigon AG, Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A. (“Rabobank”), Royal Bank of Canada, Norinchukin Bank, The Royal Bank of Scotland Group plc (“RBS Group”), and WestDeutsche Immobilienbank AG join in this letter.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,



The handwritten signature of Joel Kurtzberg, consisting of stylized initials "J.K." followed by his last name.

Joel Kurtzberg

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

BY ECF (W/O ENCLOSURES)